

J. Andrew Coombs (SBN 123881)  
*andy@coombspc.com*  
Annie S. Wang (SBN 243027)  
*annie@coombspc.com*  
J. Andrew Coombs, A P. C.  
517 East Wilson Avenue, Suite 202  
Glendale, California 91206  
Telephone: (818) 500-3200  
Facsimile: (818) 300-3201

Attorneys for Plaintiff  
Adobe Systems Incorporated

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO)

Adobe Systems Incorporated,	)	Case No. CV08-698 MMC
	)	
Plaintiff,	)	REQUEST FOR CONTINUANCE OF
v.	)	DEADLINE TO FILE MOTION FOR
	)	DEFAULT JUDGMENT AGAINST ALL
Corey C. Ressler, et al.	)	DEFENDANTS; DECLARATION IN
	)	SUPPORT
Defendants.	)	

Plaintiff Adobe Systems Incorporated ("Plaintiff") hereby requests a short continuance of the deadline set by the Court to file its Motion for Default Judgment currently on calendar for June 13, 2008, to July 3, 2008, or a date thereafter acceptable to the Court based on the following:

Plaintiff obtained a default against Defendant Corey C. Ressler on or about March 31, 2008.

On or about May 9, 2008, Plaintiff filed its First Amended Complaint adding Defendant Paul A. Ressler.

Plaintiff served its First Amended Complaint and Summons on Defendant Paul A. Ressler on or about May 16, 2008.

A request for entry of default against Paul A. Ressler was filed with the Court on or about June 6, 2008, which is currently pending.

1           Whereas a short continuance will not affect other dates currently set by the Court, will  
2 allow Plaintiff to prepare and file one motion to address the defaults of all Defendants and would  
3 further a more complete and efficient result.  
4

5 DATED: June 6, 2008

J. Andrew Coombs, A Professional Corp.

6 By: /s/ Annie S. Wang

7 J. Andrew Coombs

8 Annie S. Wang

Attorneys for Plaintiff Adobe Systems Incorporated  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DECLARATION OF ANNIE S. WANG**

I, Annie S. Wang, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of California and the United States District Court for the Northern District of California. I am an attorney for Plaintiff Adobe Systems Incorporated ("Plaintiff") in an action styled Adobe Systems Incorporated v. Ressler, et al. I make this declaration in support of Plaintiff's administrative request that the Court continue the deadline for Plaintiff to file its motion for default judgment. Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:

2. I am informed and believe Plaintiff obtained a default against Defendant Corey C. Ressler on or about March 31, 2008.

3. I am informed and believe that on or about May 9, 2008, Plaintiff filed its First Amended Complaint adding Defendant Paul A. Ressler.

4. I am informed and believe Plaintiff served its First Amended Complaint and Amended Summons on Defendant Paul A. Ressler on or about May 16, 2008.

5. I am informed and believe a request for entry of default was filed with the Court on or about June 6, 2008, and default is now pending as to Defendant Paul A. Ressler.

6. A short continuance will not affect the Case Management Conference currently set for August 22, 2008, and will allow Plaintiff to prepare and file one motion to address the defaults of all Defendants. I am informed and believe one default motion for all named Defendants would further a more complete and efficient result.

I declare under penalty of perjury that the foregoing is true and correct under the laws of the United States of America.

Executed this 6<sup>th</sup> day of June, 2008, at Glendale, California.

/s/ Annie S. Wang  
ANNIE S. WANG

**PROOF OF SERVICE**

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, and not a party to the above-entitled cause. I am employed by a member of the Bar of the United States District Court of California. My business address is 517 East Wilson Boulevard, Suite 202, Glendale, California 91206.

On June 6, 2008, I served on the interested parties in this action with the:

REQUEST FOR CONTINUANCE OF DEADLINE TO FILE MOTION FOR  
DEFAULT JUDGMENT AGAINST ALL DEFENDANTS; DECLARATION IN  
SUPPORT

[PROPOSED] ORDER CONTINUING DEADLINE TO FILE DEFAULT  
JUDGMENT MOTION AGAINST DEFENDANTS

for the following civil action:


Adobe Systems Incorporated v. Corey C. Ressler, et al.

by placing a true copy thereof in a sealed envelope. I am readily familiar with the office's practice of collecting and processing correspondence for mailing. Under that practice it would be deposited with the United States Postal Service on the same day with postage thereon fully prepaid at Glendale, California in the ordinary course of business. I am aware that on motion of the party served, service presumed invalid if postal cancellation date or postage meter is more than one day after date of deposit for mailing in affidavit.

Corey C. Ressler 1540 Kuser Rd., #A-2 Hamilton, New Jersey 08619	Paul Ressler 1540 Kuser Rd., #A-2 Hamilton, New Jersey 08619
--	--

Place of Mailing: Glendale, California

Executed on June 6, 2008, at Glendale, California

  
\_\_\_\_\_  
Annie Wang

J. Andrew Coombs (SBN 123881)  
*andy@coombspc.com*  
Annie S. Wang (SBN 243027)  
*annie@coombspc.com*  
J. Andrew Coombs, A P. C.  
517 East Wilson Avenue, Suite 202  
Glendale, California 91206  
Telephone: (818) 500-3200  
Facsimile: (818) 300-3201

Attorneys for Plaintiff  
Adobe Systems Incorporated

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO)

Adobe Systems Incorporated,	)	Case No. CV08-698 MMC
	)	
Plaintiff,	)	[PROPOSED] ORDER CONTINUING
v.	)	DEADLINE TO FILE DEFAULT
	)	JUDGMENT MOTION AGAINST
Corey C. Ressler, et al.	)	DEFENDANTS
	)	
Defendants.	)	

WHEREAS Plaintiff Adobe Systems Incorporated ("Plaintiff") filed its request to continue the deadline set by the Court to file its Motion for Default Judgment against all Defendants, and good cause being shown, the deadline to file such motion currently set for June 13, 2008, is hereby continued to \_\_\_\_\_, 2008.

IT IS SO ORDERED.

DATED:

\_\_\_\_\_  
Hon. Maxine M. Chesney  
Judge, United States District Court, Northern  
District of California

PRESENTED BY:  
J. Andrew Coombs, A Professional Corp.

By: /s/ Annie S. Wang  
J. Andrew Coombs  
Annie S. Wang  
Attorneys for Plaintiff Adobe Systems Incorporated

**PROOF OF SERVICE**

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, and not a party to the above-entitled cause. I am employed by a member of the Bar of the United States District Court of California. My business address is 517 East Wilson Boulevard, Suite 202, Glendale, California 91206.

On June 6, 2008, I served on the interested parties in this action with the:

REQUEST FOR CONTINUANCE OF DEADLINE TO FILE MOTION FOR  
DEFAULT JUDGMENT AGAINST ALL DEFENDANTS; DECLARATION IN  
SUPPORT

[PROPOSED] ORDER CONTINUING DEADLINE TO FILE DEFAULT  
JUDGMENT MOTION AGAINST DEFENDANTS


for the following civil action:

Adobe Systems Incorporated v. Corey C. Ressler, et al.

by placing a true copy thereof in a sealed envelope. I am readily familiar with the office's practice of collecting and processing correspondence for mailing. Under that practice it would be deposited with the United States Postal Service on the same day with postage thereon fully prepaid at Glendale, California in the ordinary course of business. I am aware that on motion of the party served, service presumed invalid if postal cancellation date or postage meter is more than one day after date of deposit for mailing in affidavit.

Corey C. Ressler 1540 Kuser Rd., #A-2 Hamilton, New Jersey 08619	Paul Ressler 1540 Kuser Rd., #A-2 Hamilton, New Jersey 08619
--	--

Place of Mailing: Glendale, California  
Executed on June 6, 2008, at Glendale, California

  
\_\_\_\_\_  
Annie Wang